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August 12, 2021

By ECF

The Honorable Gregory H. Woods
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2260
New York, NY 10007

Cardwell v. Davis Polk & Wardwell LLP, et al.
19-cv-10256-GHW (S.D.N.Y.)

Dear Judge Woods:

We represent the parties in the above-captioned action and write as to two matters.

First, a status conference is calendared for August 23, 2021, and the parties are due to submit a joint status letter on August 16, 2021 discussing, among other items, the anticipated length of trial. ECF 27, 143, 195. Because these items are difficult to estimate in advance of rulings on pending motions (defendants' partial motion to dismiss and plaintiff's motion for leave to file a Third Amended Complaint, ECF 115, 165), the parties respectfully request that the conference be adjourned for a later date convenient for the Court, after such rulings.

Second, plaintiff respectfully requests that he be permitted to file a pre-motion letter seeking leave to move for summary judgment on the same timeline as defendants, as outlined in

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The Honorable Gregory H. Woods

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ECF 195, and that the corresponding deadline to file a motion for summary judgment be extended. Defendants consent to this request.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/s/ Susanna Buergel

Susanna Buergel

cc: Counsel of Record (*Via ECF*)